

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND**

**In re: Michael T. Owen  
Deborah A. Owen**

**BK No. 18-10973**

**Debtors**

**Chapter 13**

**OBJECTION TO ALLOWANCE OF CLAIM OF 201 WAYLAND AVENUE**

Now come the Debtors, **Michael T. Owen and Deborah A. Owen**, in the above-captioned matter and hereby objects to the allowance of Claim #22, by 201 Wayland Avenue in the amount of \$49,661.00. As grounds for the Objection, Debtors state as follows:

201 Wayland Avenue and Marcainne Andreozzi (hereinafter known as “Creditor”) filed the proof of claim as a Creditor of the above Debtors, Claim Number 22, 22-1, in the amount of \$49,661.00. This proof of claim does not contain any justification for the listed amounts allegedly owed by the Debtors. The proof of claim does not include any documentation that proves that the amounts are actually owed by the Debtors. Debtor Deborah Owen never held an ownership relationship nor an employment relationship with Synergy Health Fitness LLC.

WHEREFORE, the Debtors pray that this Proof of Claim # 22 filed by 201 Wayland Avenue be denied as filed.

**NOTICE OF TIME TO RESPOND/OBJECT**

Within fourteen (14) days if served electronically, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006 if you were served by mail or other excepted means specified, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Bankruptcy Court Clerk’s Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed within the time allowed herein, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise. If you timely file such a response, you will be given thirty (30) days’ notice of the hearing date for this objection.

**Michael T. Owen**  
**Deborah A. Owen,**  
By their Attorney,  
**/s/Janet J. Goldman**  
Janet J. Goldman, Esq.  
Bar Number: 4081  
51 Jefferson Boulevard  
Warwick, RI 02888  
401-785-2300

Date: 9/25/2018

### **CERTIFICATE OF SERVICE**

I hereby certify that on **September 25, 2018**, I electronically filed an Objection to Allowance of Claim with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System. The following participants have received notice electronically:

Gary L. Donahue, AUST  
John Boyajian, Chapter 13 Trustee  
Tatyana P. Tabachnik, Esq.  
Bernard J. Lemos, Esq.  
Lynda L. Laing, Esq.

and I hereby certify that I have mailed by United States Postal Service, postage pre-paid, the document and a copy of the Notice of Electronic Filing to the following non CM/ECF participant:

Law Office of Mark P. Gagliardi  
201 Wayland Avenue  
Suite 8  
Providence, RI 02906

/s/Pamela Kilstein